



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

GENERAL NOTICE LETTER AND INFORMATION REQUEST
URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL NO. 389 855 472 -- RETURN RECEIPT REQUESTED

Mr. David F. Burr, President
Rollins Leasing Corp.
1 Rollins Plaza
Wilmington, DE 19803

FEB 12 1993

Re: San Gabriel Valley Superfund Sites, Areas 1-4
Los Angeles County, California
Property located at: 18301 E. Arenth Avenue, City of
Industry, CA 91748

Dear Mr. Burr:

NOTICE OF POTENTIAL LIABILITY

This letter notifies you of potential liability, as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9607(a), as amended ("CERCLA"), that you may incur or may have incurred with respect to the San Gabriel Valley Superfund Sites ("Sites"). This letter also notifies you of potential response activities at the Sites which you may be asked to perform or finance at a later date.

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the Sites. EPA has spent, or is considering spending, public funds on actions at the Sites. Unless EPA reaches an agreement under which a potentially responsible party or parties ("PRPs") will properly perform or finance such actions, EPA may perform these actions pursuant to CERCLA § 104, 42 U.S.C. § 9604.

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6973, as amended ("RCRA"), and other laws, PRPs may be obligated to implement response actions deemed necessary by EPA to protect the public health or welfare or the environment and may be liable for all costs incurred by the government in responding to any release or threatened release at the Sites. Such actions and costs may include, but are not limited to, expenditures for conducting a Remedial Investigation and Feasibility Study ("RI/FS"), a Remedial Design and Remedial Action ("RD/RA") and other investigation, planning, response and enforcement activities.

Based on evidence collected during investigation of the Sites, EPA believes that you may be a PRP with respect to the Sites. PRPs under CERCLA include current and former owners and operators of property at the Sites, persons who arranged for the disposal of hazardous substances found at the Sites, or persons who accepted hazardous substances for transport to the Sites. By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you to voluntarily perform or finance those response activities that EPA determines are necessary at the Sites.

In accordance with CERCLA and other authorities, EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Sites. EPA may expend additional funds for response activities at the Sites under the authority of CERCLA and other laws.

SITE RESPONSE ACTIVITIES

At present, EPA is planning to conduct, or has already conducted, either independently or in conjunction with the California Regional Water Quality Control Board - Los Angeles Region ("RWQCB") and/or other agencies, the following activities at the Sites:

1. Remedial investigations of sources of contamination and the extent of soil and ground water contamination at or in proximity to your facility and throughout the Sites.
2. Feasibility study of remedial alternatives (Baldwin Park Operable Unit).
3. RD/RA to design and implement the remedial action(s) selected and approved by EPA for the Sites (Richwood Operable Unit).
4. Follow-through activities to operate, maintain, and monitor the completed remedial action(s) as required at the Sites after completion of the remedial design and action (Richwood Operable Unit).

With regard to (1) above, pursuant to Section 3013 of RCRA, 42 U.S.C. § 6934, and/or Sections 104 and 106 of CERCLA, 42 U.S.C. §§ 9604 and 9606, PRPs at the Sites are responsible for investigations and remedial actions concerning not only releases or threatened releases of hazardous substances from their own facilities, but also the area wide ground water contamination. EPA has specific authority under CERCLA to require PRPs to conduct investigations and provide information regarding releases or threatened releases of hazardous substances. EPA is currently in the process of gathering such information and, to that end, has included an information request with this letter.

In the event that contamination is continuing to be released or threatened to be released from your facility, EPA believes that it would be prudent to initiate and complete these investigations as soon as possible. If you are under investigation by the Regional Water Quality Control Board (RWQCB) you should continue to cooperate with their investigative activities.

SPECIAL NOTICE AND NEGOTIATION MORATORIUM

You may receive additional EPA notices in the future. These notices will inform you that EPA is using the CERCLA Section 122(e) "Special Notice" procedures to formally negotiate terms of a consent agreement to conduct or finance site response activities or it will inform you that EPA is not using this procedure. If EPA does not use the Special Notice procedures set forth in CERCLA Section 122(e), the notice will specify that Special Notice was inappropriate in this case.

Under Section 122(e), EPA has the discretionary authority to use the Special Notice procedures if EPA determines that such procedures would facilitate an agreement between EPA and the PRPs and would expedite remedial action at the Sites. Use of the Special Notice procedures triggers a moratorium on certain EPA activities at the Sites. The purpose of the moratorium is to provide a period of time when PRPs and EPA may enter into formal negotiations for PRP conduct or financing of the response activities at the Sites.

If EPA determines that a good faith offer has not been submitted within the first 60 days of the moratorium period, EPA may terminate the negotiation period under CERCLA Section 122(e)(4). EPA is then authorized to commence such clean-up or enforcement actions as it deems appropriate. In the absence of an agreement with the PRPs to perform or finance the necessary clean-up activities, EPA may undertake these activities and pursue cost reimbursement from the PRPs.

INFORMATION TO ASSIST POTENTIALLY RESPONSIBLE PARTIES

To assist the PRPs in preparing a proposal and in negotiations concerning this matter, EPA is providing as an attachment to this letter a list of names and addresses of PRPs to whom this notification is being or has been sent. PRPs within the Puente Valley and Baldwin Park operable unit boundaries have been grouped separately. This list represents EPA's preliminary findings on the identities of PRPs. Inclusion on, or exclusion from, this list does not constitute a final determination by EPA concerning the liability of any party for the release or threatened release of hazardous substances at the Sites. EPA may update this list at any time. You may wish to contact EPA periodically to inquire about any such update and to receive an updated list.

PUENTE VALLEY OPERABLE UNIT

EPA plans to issue Special Notice to selected Puente Valley PRPs in March of 1993. Puente Valley PRPs will be requested to conduct a Remedial Investigation/Feasibility Study (RI/FS) which will characterize the nature and extent of groundwater contamination and will evaluate potential contaminant migration control actions at the western Puente Valley.

REQUEST FOR INFORMATION

Attached to this letter is an information request issued pursuant to Section 104(e) of CERCLA. Full compliance with this request is mandatory. Section 104(e) of CERCLA permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance. You should contact EPA within five (5) working days of your receipt of this letter if you wish to discuss the Request for Information.

PRP STEERING COMMITTEE

EPA recommends that all PRPs meet to select a steering committee responsible for representing the group's interests. Establishing a manageable group is essential for successful negotiations with EPA. Alternatively, EPA encourages all PRPs to select one person from their company or organization who will represent their interests.

ADMINISTRATIVE RECORD

Pursuant to Section 113(k) of CERCLA, EPA has established an administrative record file that contains documents that will form the basis of EPA's decision on the selection of a response action(s) for the Sites. This administrative record file is open to the public for inspection and comment.

In addition, when the San Gabriel Valley Superfund Project began, EPA established ten (10) information repositories at various locations around the San Gabriel Valley. These ten (10) repositories have been divided into three (3) primary and seven (7) secondary repositories. The primary repositories contain a comprehensive collection of public documents prepared for the project. The secondary repositories contain fact sheets and those documents specifically relevant to the community where the repository is located.

The primary repositories are:

1. Baldwin Park Public Library
4181 Baldwin Park Blvd.
Baldwin Park, CA 91706
(818) 962-6947

2. Upper San Gabriel Valley Municipal Water District
11310 East Valley Blvd.
El Monte, CA 91731
(818) 443-2297
3. The University Research Library
University of California - Los Angeles
Public Affairs Service
405 Hilgard Avenue
Los Angeles, CA 90024
(213) 825-3135

The secondary repositories are:

1. Alhambra City Library
410 West Main Street
Alhambra, CA 91801
(818) 570-5008
2. San Gabriel Valley Municipal Water District
549 East Sierra Madre Blvd.
Azusa, CA 91702
(818) 969-7911
3. El Monte Library
3224 North Tyler Avenue
El Monte, CA 91731
(818) 444-9506
4. West Covina Public Library
1601 West Covina Parkway
West Covina, CA 91790
(818) 962-3541
5. Hacienda Heights Public Library
16010 La Monde Street
Hacienda Heights, CA 91745
(818) 968-9356
6. Whittier Central Public Library
7344 South Washington Street
Whittier, CA 90602
(213) 698-8949
7. Norwood Public Library
4550 North Peck Road
El Monte, CA 91732
(818) 443-3147

PRP RESPONSE AND EPA CONTACT

You should notify EPA in writing within thirty (30) days of your receipt of this letter of your willingness to conduct or

finance response activities at the Sites and to participate in possible future negotiations. If you are a member of a steering committee you may respond to this letter through your steering committee. If EPA does not receive a timely response, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the response activities at the Sites, and that you have declined any involvement in performing the response activities. You may be held liable by EPA under Section 107 of CERCLA for the cost of any investigative and clean-up activities EPA performs at the Sites.

In your response to this letter, please indicate the appropriate name, address, and telephone number for further contact. If you are already involved in discussions with state or local authorities (e.g. RWQCB), engaged in voluntary clean-up action, or are involved in a lawsuit regarding this Sites, you should continue such activities as appropriate. This letter is not intended to advise you or to direct you to restrict or to discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter, and to provide a copy of the response to any other parties involved in those discussions or actions.

Your response to this letter should be sent to:

Phillip Ramsey
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you or your attorney have any legal questions pertaining to this matter, please direct such questions to Mark Klaiman, Assistant Regional Counsel at (415) 744-1374. If you need information concerning technical issues, please contact Phillip Ramsey at (415) 744-2258.

Sincerely yours,



David B. Jones, Chief
Superfund Remedial Action Branch

Attachments

cc: Robert Ghirelli, Executive Officer
Los Angeles Regional Water Quality Control Board

Mark J. Klaiman, Assistant Regional Counsel

Phillip Ramsey, South Coast Groundwater Section (H-6-4)

ATTACHMENT I

RECIPIENTS OF GENERAL NOTICE OF LIABILITY FOR THE SAN GABRIEL
VALLEY SUPERFUND SITES

ATTACHMENT II

REQUEST FOR INFORMATION PURSUANT TO SECTION 104 OF CERCLA

The EPA is conducting an investigation of soil and groundwater contamination or threatened contamination resulting from the release or threatened release of hazardous wastes and/or substances in the San Gabriel Valley. The purpose of this investigation is to determine the nature, cause, and extent of the release or threatened release of hazardous substances in the area, and to determine the source or sources of such releases or threatened releases, to assess the effects of any release or threatened release on the public health or welfare or the environment, to determine the details and evaluate the adequacy of any remedial actions that have been planned or initiated to date, and to determine what future response actions are needed to abate the release or threatened release of such substances to the environment.

As part of this investigation, EPA needs historical and present information from companies currently or previously located near the area of known or suspected contamination and from past and present property owners. EPA has reason to believe that you may be in possession of such information. Therefore, pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. § 9604, you are hereby requested to respond to the Request for Information set forth herein.

Compliance with the Request for Information is mandatory. Failure to respond fully and truthfully within thirty - five (35) days of receipt, or to adequately justify such failure to respond, can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA. This statute permits EPA to seek imposition of penalties up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Request for Information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et. sec.

Include in your response to this request a notarized affidavit from a responsible company official stating that a diligent record search was completed and (for businesses receiving the Request for Information) that there was a diligent interview of present and former employees who may have knowledge of operations, chemical use, and business practices. The affidavit should include a statement that all information responsive to this request has been forwarded to EPA. The response itself must be signed by a duly authorized official of your company or identified property owner.

DISCLOSURE OF CONFIDENTIAL INFORMATION
TO AUTHORIZED REPRESENTATIVES OF EPA

Pursuant to 40 C.F.R. § 2.310(h), Disclosure to authorized representatives, you are hereby furnished with notice of the contemplated disclosure by EPA of the information provided in response to this Request for Information to EPA's contractors and state or local government agencies which have duties or responsibilities under CERCLA. Any comments on this contemplated action must be submitted to EPA within thirty (30) days of receipt of this notice.

Information that may be disclosed includes any response to this Request for Information. This information may be made available to authorized representatives of EPA for any or all of the following reasons:

- o Document handling, inventory, and indexing;
- o Document review and analysis; and
- o Technical review of the responses.

Authorized representatives of EPA to whom EPA may disclose information contained in your response are:

- o PRC Environmental Management, Inc.; EPA Contract No. 068-W9-0009
- o CH2M Hill California, Inc.; EPA Contract No. 068-W9-0031
- o Labat Anderson, Inc.; EPA Contract No. 068-W9-0052
- o California State Water Resources Control Board and California Regional Water Quality Control Board-Los Angeles Region; EPA Cooperative Agreement No. V-009472-01-4

You must respond to this Request for Information by letter, signed by you or a duly authorized official, submitted to the following office with thirty-five (35) days of your receipt of this Request:

Phillip Ramsey
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you or your attorney have any legal questions pertaining to this matter, please direct such questions to Mark Klaiman, Assistant Regional Counsel at (415) 744-1374. If you need information concerning technical issues, please contact Phillip Ramsey at (415) 744-2258.

Instructions

1. A separate response must be made to each of the Questions set forth in this Request for Information.
2. Precede each answer with the number of the question to which it corresponds.
3. If information not known or not available to you as of the date of submission of a response to this Request for Information should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of this response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
4. For each document produced in response to this Request for Information indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. For each and every Question contained herein, identify the person(s) answering these Questions on behalf of Respondent.
6. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
7. For each and every Question contained herein, identify all persons, including Respondent's employees, who have knowledge or information about the subject matter of the Question.
8. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
9. For each and every Question contained herein, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any Questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
10. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody, or control, then identify the persons from whom such information may be obtained.
11. Where specific information has not been memorialized in any document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

12. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. 9604(e)(7)(E) and (F), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or some other suitable form of notice employing language such as "trade secret", "proprietary", or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, subsidiaries, successors, assigns and agents.
2. The term the "Site" or the "Facility" shall mean and include the property on or about 18301 E. Arenth Avenue, City of Industry, CA 91748.
3. The term "hazardous substance" shall have the same definition as that contained in §101(14) of CERCLA and includes any mixtures of such hazardous substances with any non-hazardous substances, including petroleum products.
4. The term "hazardous materials" shall mean all hazardous substances, pollutants, contaminants, and hazardous wastes, as defined above.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business phone number, present or last known home address and home telephone number, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full

name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.

7. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or subject matter.
8. The term "release" has the same definition as that contained in 101(22) of CERCLA, 42 U.S.C. 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
9. The terms "document" and "documents" shall mean any object that records, stores or presents information and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of documents, microfilm or otherfilm record, any photograph, sound recording on any type of device, any punch card, disc or disc pack, optical disk, any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, optical disk, tape or other type of memory and together with printouts of such punch card, disc or disc pack, optical disk, tape or other type of memory) and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
10. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
11. All terms not defined herein shall have their ordinary meaning unless such terms are defined in CERCLA, in which case the statutory definitions shall apply.

Questions

1. Identify the current owner of the facility. State the dates during which the current owner owned, operated, or leased any portion of the Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including, but not limited to, purchase and sale agreements, deeds, and/or leases.
2. Identify all prior owners of the Site. For each prior owner further identify:
 - a. The dates of their ownership; and
 - b. All evidence that hazardous materials were released or threatened to be released at the Site during the period that they owned the Site.
3. Identify the prior operators and lessees of the Site. For each such operator or lessee, further identify:
 - a. The dates of their operations at, or lease of, the Site;
 - b. The nature of their operations at the Site; and
 - c. All evidence that hazardous materials were released or threatened to be released at the Site during the period in which they were operating at the Site.
4. State whether or not you acquired the Site after the disposal or placement of the hazardous substances on, in, or at the Site. Describe all of the facts on which you base the answer to this Question.
5. State whether or not you knew or had reason to know, at the time you acquired the Site, that any hazardous substances was disposed of on, in, or at the facility. Describe all investigations of the Site that you took prior to acquiring the Site, and all of the facts on which you base the answer to this Question.
6. Identify all liability insurance policies held by Respondent from the time Respondent began operations at, or assumed ownership of (whichever occurred earlier), the Site until the present. In identifying such policies, state:
 - a. The name and address of each insurer and of the insured;
 - b. The amount of coverage under each policy;
 - c. The commencement and expiration dates for each policy;

- d. Whether or not the policy contains (or contained) a "pollution exclusion" clause; and
- e. Whether or not the policy covers (or covered) sudden, nonsudden, or both types of accidents.

In lieu of providing the information requested in subparts a. through e. of this Question, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials.

- 7. Complete the enclosed four-page form entitled "Financial Statement for Businesses" or provide an audited financial statement that contains all of the information requested in the form. If you choose to provide an audited financial statement in lieu of the Financial Statement for Businesses you must also provide a signed declaration equivalent to the Certification found at the bottom of page four of the enclosed form.
- 8. In addition to the information requested in the previous question, provide copies of your company's federal income tax forms (including attachments) as submitted to the Internal Revenue Service for the last three years. The forms must be signed by a duly authorized official of your company.
- 9. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.



U.S. Environmental Protection Agency, Region IX

Financial Statement for Businesses *

(If additional space is needed, attach a separate sheet)

1. Your name and address <i>(including zipcode and county)</i>	1a. Business name and address <i>(including zipcode and county)</i>	2. Business phone number ()	4. (Check appropriate box) <input type="checkbox"/> Sole proprietor <input type="checkbox"/> Trust <input type="checkbox"/> Partnership <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Corporation
3. Name and address of registered agent <i>(including zipcode and county)</i>			

5. State of Incorporation (or country if foreign)	5a. Employer Identification Number	6. Date of Incorporation	7a. Type of business
			7b. SIC Code

8. Information about owner, partners, officers, directors, major shareholder (5% or more stock ownership), other holders of more than 5% equity interest, holders of rights to purchase more than equity interest and other persons with an ability to control.

Name and Title	Effective Date	Home Address	Social Security Number (optional)	Phone Number ^{***}	Total Shares or Interest

Section I General Financial Information

9. Last three years Federal and state income tax returns	Forms Filed	Tax Years ended	Net Income before taxes
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10. Bank accounts (List all types of accounts including checking, savings, certificates of deposit, etc.)

Name of Institution	Address	Type of Account	Account No.	Balance
Total (Enter in item 19)				

11. Bank Credit available (Lines of credit, etc.)

Name of Institution	Address	Credit Limit	Amount Owed	Credit Available	Monthly
Totals					

12. Location, box number, and contents of all safe deposit boxes rented or accessed

* This information is requested pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, and is not subject to approval of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Section I - continued

General Financial Information

13. Real property

Brief Description and Type of Ownership	Address (Include county, state and parcel number)
a.	
b.	
c.	

14. Insurance policies owned with business as beneficiary

Name Insured	Company	Policy Number	Type	Face Amount	Available Loan Value
Total (Enter in Item 21)					▶

15. Additional Information (Court and administrative proceedings by or against the business, settlement agreements, agreements to purchase or sell tangible or financial assets other than in the ordinary course of business, legal claims [whether asserted or not], bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, options to buy or sell real or personal property, real or personal property being purchased under contract, real or personal property being held on behalf of the business).

15a. List all subsidiaries owned, joint ventures, partnerships and other entities controlled by the business. Provide current market value of the business' interest in such subsidiary or other entity.

16. Federal government departments or agencies with whom you have a contract for payment of goods or services

Agency Name	Address	Contract No.	Amount to be Received	Payment Due Date

16a. Federal government departments or agencies that have extended or given the business loans, grants or assistance, or to which you have applied (or anticipate applying for any loan, grant, or assistance) in the past 5 years.

17. Accounts/Notes receivable (Include loans to stockholders, officers, partners, etc.)

Agency Name	Address	Amount Due	Due Date	Status
Total (Enter in Item 20)				▶

Section II.

Asset and Liability Analysis

Description (a)	Cur. Mkt Value (b)	Liabilities Bal. Due (c)	Equity in Asset (d)	Amount of Mo. Pymt. (e)	Name and Address of Lien/Note Holder/Obligee (f)	Date Pledged (g)	Date of Final Pymt. (h)
18. Cash on hand							
19. Bank accounts							
19a. Securities and other financial assets owned							
20. Accounts/Notes receivable							
21. Insurance Loan Value							
22. Real property (from Item 13)	a.						
	b.						
	c.						
	d.						
23. Vehicles (Model, year, license)	a.						
	b.						
	c.						
24. Machinery and equipment (Specify)	a.						
	b.						
	c.						
25. Merchandise Inventory (Specify)	a.						
	b.						
26. Other Assets (Including permits, licenses, tax loss carry forwards, agreements not to compete, other contracts) (Specify)	a.						
	b.						
	c.						
	d.						
27. Other Liabilities (Include judgements, notes, tax liens, etc.)	a.						
	b.						
	c.						
	d.						
	e.						
28. Federal & State Taxes Owed							
29. Totals							

1851- 04515

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. David F. Durr, President
Rollins Leasing Corp.
1 Rollins Plaza
Wilmington, DE 19803

4a. Article Number

P 389 855 472

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

2/16/93

5. Signature (Addressee)

[Handwritten Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.